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**y.**

as *AMICUS CURIAE*.

(GAG)

1. The Honorable Gustavo A. Gelpí issued an Order inviting the appearance of *Amicus Curiae* in the present case, with a deadline of April 1, 2013.
2. Simultaneously with this motion, I am filing a motion requesting leave to appear as *Amicus Curiae* in the present case, which serves as a notice of intent; and in which I explain the merits of my application.
3. I am not a licensed attorney; I am a law student, and this case is vested with great public interest, since it purports to implement far-reaching reforms to the PRPD.
4. Due to the public interest in the case, and to my lack of experience postulating before this Honorable Court, I would like to ask for an extension of thirty (30) days of the term to file a brief, as set forth in the Honorable Gustavo A. Gelpí's Order inviting the appearance of *Amicus Curiae*.

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5. This first request is made before the term expires, in accordance to the tenets set forth in RULE 6 (B) (1) (A) of the FEDERAL RULES OF CIVIL PROCEDURE, and RULE 6 of the LOCAL RULES FOR THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO.

6. I do not foresee that granting such request would be an imposition upon either the Plaintiff, the United States Department of Justice, nor the Defendants, the Commonwealth of Puerto Rico and the PRPD; since they are still formulating a proposed budget for the agreement that is supposed to resolve this Complaint.

7. I would like to add a *proviso* to this request, and it is that, with the permission of this Honorable Court, and of the Honorable Gustavo A. Gelpí, that based upon the merits of my motion requesting leave to appear as *Amicus Curiae*, that I would be able to attend the pre-trial meetings that will take place before the requested extension of term expires; specifically, the meeting that is scheduled to take place on April 11, 2013.

8. I will try, in the meantime, to prepare a *Memorandum* for the above meeting; so that the attorneys for the Plaintiff and the Defendants may make comments and recommendations, if they so seem fit; and to assure that the brief I present will meet with the standards and specifications of the Honorable Gustavo A. Gelpí, the Presiding Judge in this case.

9. Although an *Amicus Curiae* is not supposed to take place in any active litigation, since this case will apparently be resolved by means of a consensual agreement, I hope that my intention to contribute positively to the resolution of this case will be welcome.

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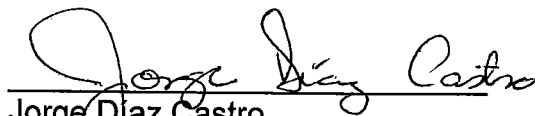
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10. I would like to thank this Honorable Court, the Honorable Gustavo A. Gelpí, Presiding Judge in the present case, and both attorneys for the Plaintiff, the United States Department of Justice, and for the Defendants, the Commonwealth of Puerto Rico and the PRPD, for their patience and forbearance in regards to my application to appear as *Amicus Curiae* in the present case. I will attempt to delimit the scope of my involvement in the present case in my proposed *Amicus Curiae* brief. If approved, I do hope that my contribution will be one of service to all the parties involved in this Complaint, and to this Honorable Court.

Respectfully submitted this 1<sup>st</sup> day of April, 2013, in the city of San Juan, Puerto Rico.



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